

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Northern Division**

THE BILL LUKOWSKI STEAMSHIP
AGENCY, INC.
2202 Boston Street
Baltimore, MD 21231,

Plaintiffs,

v.

M/V SNOW BIRD
IMO No. 7726744,

Defendant.

Civil Action No.

* * * * *

**VERIFIED COMPLAINT *IN REM* WITH REQUEST
FOR WRIT OF ARREST**

Plaintiff The Bill Lukowski Steamship Agency, Inc. ("Lukowski"), through undersigned counsel, hereby sues the M/V SNOW BIRD and states further as follows:

Jurisdiction and Venue

1. This Complaint concerns enforcement of a maritime lien and is within the admiralty and maritime jurisdiction of this Court within the meaning of 28 U.S.C. § 1333 and Fed. R. Civ. P. 9(h).

The Parties

2. Plaintiff Lukowski is a corporation of the United States of America and is a vessel agent with its principal place of business in Baltimore, Maryland.

3. The M/V SNOW BIRD is an ocean-going cargo vessel presently docked at Pier 10, Canton, in the Port of Baltimore, and is thus in this District.

**Prayer For The Arrest Of The SNOW BIRD By
Lukowski Pursuant To Supplemental Rule C**

4. Pursuant to an agreement between Lukowski and Owners/Operators of the SNOW BIRD, Lukowski was retained to act as the Baltimore local husbanding agent for the SNOW BIRD during the vessel's stay in Baltimore in April of 2008. Pursuant to this agreement, Lukowski made arrangements for various services to be provided to the vessel, including but not limited to, pilot services, tug services, line services, security services, launch services, vessel repair services and other services. Lukowski has paid for such services on behalf of Owners/Operators, and is subrogated to the maritime liens of those who provided services to the vessel in total amount of \$66,565.21. Lukowski is also owed \$9,000 for his own agency services provided to the vessel. Lukowski has demanded payment of the above sums and Owners/Operators have refused to make payment. Attached hereto as Exhibit A is a detailed accounting of the above amounts.

WHEREFORE, plaintiff respectfully requests:

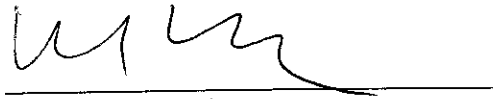
A. that this Court order that a warrant for the arrest of the M/V SNOW BIRD, etc., be issued and served upon that vessel, and that the vessel be arrested, *in rem*, to secure to plaintiff its claims against the vessel and that judgment be entered in favor of plaintiff and against the SNOW BIRD in the amount of \$75,565.21, plus attorneys' fees and costs;

B. that defendant vessel, through its owner or authorized representative, be cited to appear and answer all and singular the matters aforesaid and that a judgment may be entered herein in favor of the plaintiff for the amount of its claims, including contractual interest, attorneys' fees, prejudgment interest and costs;

C. that this Court award plaintiff such other and further relief as is proper.

Dated: April 29, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'R. B. Hopkins', written over a horizontal line.

Robert B. Hopkins
Trial Bar No. 06017
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Attorneys for Plaintiffs